



Health e(fx) Code of Ethics



A MESSAGE FROM MICHAEL

Our ethics shape everything we do here at Health e(fx). They guide our interactions with our customers, our team members and the industry as a whole. And it is our adherence to ethical practices that has made us the successful company we are today. As we look to the future, our continual growth will be dictated in large part by our adherence to our ethics. That's why I'm happy to announce the rollout of our Code of Ethics, a vital component of our Ethics and Compliance program.

Over the next few weeks I encourage all of you to review our Code and to reach out to your manager, Human Resources or Compliance with any ethics and compliance questions or concerns that you may have. All feedback is welcome, as this Code and our 5 Words set the standard for our behavior and, ultimately, our corporate success.

I know you will do your best to live by our Code in each of your daily tasks and I thank you for your commitment.



A MESSAGE FROM KYLE

The announcement of our own Code of Ethics marks an exciting time for Health e(fx). Our successes have brought us to this point, and as we continue to grow, the creation of a Code of Ethics governing our future course was necessary.

This Code of Ethics provides you, our employees, best practice standards for handling conflicts of interest, complying with relevant laws, protecting trade secrets and several other essential focus points. Please take the time to review our Code of Ethics and implement these standards into your daily objectives, and reach out to your manager, Human Resources or Compliance with any questions.

Thank you for your time and I look forward to seeing what each of you can do by putting this Code of Ethics into practice.

CODE OF ETHICS

THE CODE

Although Health e(fx) cannot address every possible issue or provide answers to every potential dilemma, this Code defines the spirit in which we intend to do business and should guide us in our daily conduct.

FOCUS

We are focused on preventing violations of applicable laws and regulations, and we are committed to understanding and complying with the laws, company rules and regulations where we do business.

CUSTOMER

We exist to help our customers and their employees succeed. We understand we are here today and will continue to be here in the future because of our customers. We are respectful of and are advocates for our customers. We strive to make each customer feel like they are important. We work hard to listen to their needs, so we can best solve their business problems.

RESPECT

We all want and deserve to work in an environment where we are treated with dignity and respect. So, we will help create an open and supportive environment where our co-workers feel comfortable raising questions and that brings out the full potential in each of us. We act with honesty, integrity and respect.

RESPONSIBLE

We are sometimes faced with decisions we would rather not have to make and issues we would prefer to avoid. But we have the courage to tackle tough decisions and make difficult choices, because we are committed to doing the right thing at all times. In some cases, this will mean we are responsible for doing more than simply what the law requires. Merely because we can pursue a course of action does not mean we **should** do so. We are all responsible for our actions.

TOGETHER

We believe our business practices define our corporate character. We understand even seemingly small decisions by one individual can have an outsized impact on our business. Therefore, every decision we make is in the best interest of the business as a whole. We seek ways to collaborate, we value teamwork, we assume positive intent, and we do what's right for the greater good.

MANAGER COMMITMENT

To make our Code work, managers are responsible for promptly addressing ethical questions or concerns raised by employees and for taking the appropriate steps to deal with any issues. At Health e(fx), we want the ethics and compliance dialogue to become a natural part of daily work.

Managers should feel free to consult with Human Resources or Compliance regarding any ethical or compliance issues that arise.

HEALTH E(FX) COMMITMENT

Health e(fx) is an equal employment employer and is committed to providing a workplace that is free of discrimination of all types from abusive, offensive or harassing behavior. Any employee who feels harassed or discriminated against should report the incident to his or her manager, a more senior manager, or to Human Resources.

Health e(fx) will address all reported instances of questionable or unethical behavior. In every instance where improper behavior is found to have occurred, the company will take appropriate action. We will not tolerate retaliation against employees who raise ethics concerns in good faith.

Health e(fx) is dedicated to maintaining a healthy environment. Safety information applicable to each company office location is available on the company intranet site to educate you on safety in the workplace. If you have any difficulty locating this information, please contact Human Resources.

WHAT TO DO IF YOU HAVE CODE OF ETHICS CONCERNS

Employees are encouraged, in the first instance, to address such issues with their managers, as most problems can be resolved swiftly. If for any reason that is not possible or if an employee is not comfortable raising the issue with his or her manager, issues should be reported to Human Resources or Compliance, who are available for consultation and review of ethical issues.

THE DETAILS

FAVORABLE TREATMENT

We will avoid any actions that create a perception that favorable treatment of outside entities was sought, received or given in exchange for personal business courtesies. Business benefits include gifts, gratuities, meals, refreshments, entertainment or other benefits from persons or companies with whom Health e(fx) does or may do business. We will neither give nor accept business courtesies that constitute, or could reasonably be perceived as constituting, unfair business inducements that would violate law, regulation or policies of Health e(fx) or customers, or would cause embarrassment or reflect negatively on Health e(fx)'s reputation.

GIFTS

Employees may accept unsolicited gifts, other than money, that conform to the reasonable ethical practices of the marketplace, including:

- Flowers, fruit baskets and other modest presents that commemorate a special occasion.
- Gifts of nominal value, such as calendars, pens, mugs, caps and t-shirts (or other novelty, advertising or promotional items).
- Occasional meals, refreshments, entertainment and similar business courtesies that are shared with the person who has offered to pay for the meal or entertainment.

Generally, employees may not accept compensation, honoraria or money of any amount from entities with whom Health e(fx) does or may do business. Tangible gifts (including tickets to a sporting or entertainment event) that have a market value greater than \$100 may not be accepted unless approval is obtained from management.

OFFERING BUSINESS GIFTS AND BENEFITS

Other than to government officials or employees, for whom special rules apply, we may provide nonmonetary gifts (i.e., company logo apparel or similar promotional items) to our customers. Further, management may approve other gifts and benefits, including meals, refreshments or entertainment of reasonable value to non-government officials or employees if the practice does not violate any law or regulation or the standards of conduct of the recipient's organization.

Employees with questions about accepting or offering business gifts and benefits should talk to their managers or Human Resources.

ACCURATE PUBLIC DISCLOSURES

We will make certain that all disclosures made in public documents are full, fair, accurate, timely and understandable. This obligation applies to all employees and contractors with any responsibility for the preparation for such reports, including drafting, reviewing and signing or certifying the information contained therein. No business goal of any kind is ever an excuse for misrepresenting facts or falsifying records.

Employees should inform Executive Management, Compliance, and Human Resources if they learn that information in any filing or public communication was untrue or misleading at the time it was made.

We will create, retain and dispose of our company and accounting records as part of our normal course of business in compliance with all Health e(fx) policies and guidelines, as well as with all regulatory and legal requirements.

COMPLYING WITH RELEVANT LAWS

We understand we are all responsible for understanding and complying with laws, company rules and regulations where we do business. These laws include, but aren't limited to:

- *Employment regulations*
- *ACA Employer Shared Responsibility regulatory compliance requirements*
- *Applicable security and privacy federal and state compliance requirements*
- *Applicable safety regulations*

We will seek advice from Health e(fx) Compliance when unsure of whether an action is permitted by law or Health e(fx) policy and will report suspected wrongdoing. We understand reports must be made in good faith and that this does not mean that an individual has to be right about the suspected violation.

CONFLICTS OF INTEREST

We will avoid any relationship or activity that might weaken, or even appear to weaken, our ability to make objective and fair decisions when performing our roles. We will report our own potential conflicts of interest.

HERE ARE SOME OTHER WAYS IN WHICH CONFLICTS OF INTEREST COULD ARISE:

1. Being employed (you or a close family member) by, or acting as a consultant to, a competitor or potential competitor, supplier or contractor, regardless of the nature of the employment, while you are employed with Health e(fx).
2. Hiring or supervising family members or closely related persons.
3. Serving as a board member for an outside commercial company or organization whose business may relate to Health e(fx).
4. Owning or having a substantial interest in a competitor, supplier or contractor.
5. Having a personal interest, financial interest or potential gain in any Health e(fx) transaction.
6. Placing company business with a firm owned or controlled by a Health e(fx) employee or his or her family.

Determining whether a conflict of interest exists is not always easy to do. Employees with a conflict of interest question should seek advice from management. Before engaging in any activity, transaction or relationship that might give rise to a conflict of interest, employees must seek review from their managers, Compliance, or Human Resources.

COMPETITION AND TRADE SECRETS

We will sell Health e(fx) products and services to our customers based on the merit, superior quality, functionality and competitive pricing of our products. We will make independent pricing and marketing decisions and will not improperly cooperate or coordinate our activities with our competitors. We will not offer or solicit improper payments or gratuities in connection with the purchase of goods or services for Health e(fx) or the sales of its products or services, nor will we engage or assist in unlawful boycotts of particular customers.

We respect the property rights of others. We will not acquire or seek to acquire improper means of a competitor's trade secrets or other proprietary or confidential information. We will not engage in unauthorized use, copying, distribution or alteration of software or other intellectual property.

CONFIDENTIAL AND PROPRIETARY INFORMATION

Integral to Health e(fx)'s business success is our protection of confidential company information, as well as nonpublic information entrusted to us by employees, customers and other business partners. Confidential and proprietary information includes such things as pricing and financial data, customer names, addresses or nonpublic information about other companies. We will not disclose confidential and nonpublic information without a valid business purpose and proper authorization.

USE OF COMPANY RESOURCES

Company resources, including time, material, equipment and information, are provided for company business use. Nonetheless, occasional personal use is permissible as long as it does not affect job performance or cause a disruption to the workplace.

Employees and those who represent Health e(fx) are trusted to behave responsibly and use good judgment to conserve company resources. Managers are responsible for the resources assigned to their departments and are empowered to resolve issues concerning their proper use.

We will not tolerate the use of company resources to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate.

MEDIA INQUIRIES

From time to time, employees may be approached by reporters and other members of the media. In order to ensure that we speak with one voice and provide accurate information about the company, we should direct all media inquiries to the AVP of Marketing. No one may issue a press release without first consulting with the AVP of Marketing.

DUTY TO REPORT

All employees and contractors have a duty to report known or suspected wrong doing (violations of **law or policy, or any unethical** business behavior) at Health e(fx) by reported the incident to management, leadership, Human Resources, Compliance, or to the Ethics Hotline. Health e(fx) prohibits retaliation against employees who report suspected or known wrong doing in good faith. Health e(fx) will assess and take appropriate action on each incident reported.

Regular business matters that do not require anonymity or sensitivity should be directed to the employee's manager, Human Resources, or Compliance.

RESOURCES

VP Human Resources

Cherie Coenen

AVP Compliance

Kyle J. Scott

AVP Marketing

Jenna Elving